

cc: RLP

ORIGINAL

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District of Hawaii

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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

SEP 12 2018

at 10 o'clock and 17 min. A M.  
SUE BEITIA, CLERK  
hs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	MAG. NO. 18-MJ-1013 RLP
	)	
Plaintiff.	)	CRIMINAL COMPLAINT;
v.	)	AFFIDAVIT IN SUPPORT OF
	)	COMPLAINT
JERRELL CLAYTON,	)	
	)	
Defendant.	)	
_____	)	

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true  
and correct to the best of my knowledge and belief.

COUNT 1  
Bank Fraud  
(18 U.S.C. § 1344(1))

Between in or about June 2017 and continuing through in or about July 2017, both dates being approximate and inclusive, in the District of Hawaii, the defendant, JERRELL CLAYTON, knowingly executed a scheme to obtain the money, funds, and other property owned by and under the control of American Savings Bank, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, namely, that CLAYTON provided American Savings Bank with a false and fraudulent means of identification of G.R.M. to open a checking account funded by a fraudulent loan procured in G.R.M.'s name.

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All in violation of Title 18, United States Code, Section 1344(1).

I further state that I am a Special Agent with the United States Secret Service and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint," which is incorporated herein by reference.



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TREASON AKANA  
Complainant

Subscribed to and sworn before me on  
September 12, 2018, at Honolulu, Hawaii.



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RICHARD E. PUGLISI  
UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	MAG. NO. 18-MJ-1013 RLP
	)	
Plaintiff,	)	AFFIDAVIT IN SUPPORT OF
	)	CRIMINAL COMPLAINT
v.	)	
	)	
JERRELL CLAYTON,	)	
	)	
Defendant.	)	

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

TRENSON AKANA, after being first duly sworn on oath, deposes  
and says:

**BACKGROUND**

1. I am a Special Agent with the United States Secret Service assigned to the Honolulu Field Office in the District of Hawaii. I have served in this capacity since June 2015. I am familiar with the facts set forth in this affidavit based upon my personal knowledge, as well as information provided to me by other law enforcement personnel and/or witnesses. This affidavit contains only the information necessary to support probable cause. It is not intended to include each and every fact and mater observed or known to the government.

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## **PROBABLE CAUSE**

2. In August 2017, the U.S. Secret Service received information from American Savings Bank regarding a male that had opened up multiple unsecured personal loan accounts using various state driver's licenses from outside Hawaii that bore different names, along with Social Security cards with multiple Social Security numbers. American Saving Bank also forwarded still images taken from bank surveillance footage of these transactions for my review. Upon reviewing the surveillance images, it appeared that the same individual was involved in all transactions.

3. In response to this information, I contacted the Honolulu Police Department (HPD) requesting assistance with identifying the subject from the surveillance images. With their assistance, the individual in the surveillance images was identified as JERRELL CLAYTON.

4. According to information provided by American Savings Bank, on June 16, 2017, JERRELL CLAYTON, using the false identity of G.R.M., obtained a personal unsecured loan in the amount of \$15,000.00. During the same transaction, JERRELL CLAYTON opened a checking account using G.R.M.'s name and identification and requested a cash advance of \$7,500.00, which was money drawn down on the loan. Later that same day, JERRELL CLAYTON entered two separate American Savings Bank branches and withdrew \$3,400.00

and \$3,600.00 respectively from this checking account. On July 5, 2017, JERRELL CLAYTON withdrew \$400.00 from this checking account at another American Savings Bank branch. In total, the money withdrawn by JERRELL CLAYTON from the loan and checking account that he opened in the name of G.R.M. totaled \$14,900.00.

5. On September 10, 2018, I spoke with Detective Blake Davidson of HPD who advised me that JERRELL CLAYTON was arrested on unrelated State misdemeanor charges and was currently incarcerated at the Oahu Community Correctional Center (OCCC).

6. After receiving this information, U.S. Secret Service Special Agent Karl Von Allmen and I interviewed JERRELL CLAYTON at OCCC on September 11, 2018. During the interview, JERRELL CLAYTON admitted that the person in the above-referenced surveillance images was in fact, him. JERRELL CLAYTON also admitted he used the identity of G.R.M. to open an American Savings Bank account and withdraw cash from it for his own personal gain. JERRELL CLAYTON provided a written statement and

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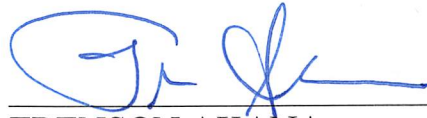
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acknowledged his involvement in this fraudulent scheme with the knowledge his activities were wrong.

Respectfully submitted,



TREASON AKANA  
Special Agent  
U.S. Secret Service

Subscribed and sworn before me this 12th day of September, 2018. Based upon the foregoing, the undersigned Judicial Officer finds that there is probable cause to believe that defendant above-named committed the crimes charged in the Criminal Complaint, this 12th day of September, 2018.



HON. RICHARD L. PUGLISI  
United States Magistrate Judge  
District of Hawaii